

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Matthew Lennon,  
Plaintiff,  
v.

Trans Union, LLC,  
Defendant.

Docket 2:25-cv-1431-CFK

---

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO DEFENDANT'S MOTION TO DISMISS**

Plaintiff, Matthew Lennon, hereby files this unopposed Motion for Extension of Time to Respond to Defendant's Motion to Dismiss, and in support avers:

1. On May 1, 2025, Defendant filed a motion to dismiss and a supporting brief.
2. Under the local rules, Plaintiff is required to either file a response to that motion, or notice of an intent to file an amended complaint, no later than May 15, 2025.
3. Plaintiff requests that the Court extend the deadline for Plaintiff to respond to the motion to dismiss until June 12, 2025.
4. The parties have been conferring in this matter, including exploring a potential resolution.
5. This extension will allow the parties to fully explore these discussions, while also allowing Plaintiff sufficient time to prepare a response in the event that the discussions are not successful.
6. This extension is not intended to delay this matter or prejudice any party

7. Defendant has received a copy of this motion in advance of its filing, and concurs with the relief being requested.

WHEREFORE, Plaintiff requests that the Court grant this motion, and extend Plaintiff's deadline to respond to Defendant's Motion to Dismiss to June 12, 2025.

*s/ Brett Freeman*

\_\_\_\_\_  
Brett Freeman  
Bar Number PA 308834  
Attorney for Plaintiff  
FREEMAN LAW  
606 Hamlin Highway, Suite 2  
Lake Ariel, PA 18436  
P: (570) 589-0010  
F: (570) 456-5955  
[brett@freeman.law](mailto:brett@freeman.law)

**CERTIFICATE OF CONCURRENCE**

Counsel have conferred on this motion, and Defendant has provided concurrence with the relief being requested.

*s/ Brett Freeman*

\_\_\_\_\_  
Brett Freeman  
Bar Number PA 308834  
Attorney for Plaintiff  
FREEMAN LAW  
606 Hamlin Highway, Suite 2  
Lake Ariel, PA 18436  
P: (570) 589-0010  
F: (570) 456-5955  
[brett@freeman.law](mailto:brett@freeman.law)

**CERTIFICATE OF SERVICE**

Service is being effectuated through the Court's CM/ECF system.

*s/ Brett Freeman*

\_\_\_\_\_  
Brett Freeman

Bar Number PA 308834  
Attorney for Plaintiff  
FREEMAN LAW  
606 Hamlin Highway, Suite 2  
Lake Ariel, PA 18436  
P: (570) 589-0010  
F: (570) 456-5955  
[brett@freeman.law](mailto:brett@freeman.law)